

U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson Street
Craig, CO 81625

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2010-0098-DNA

CASEFILE/PROJECT NUMBER: COC69110

PROJECT NAME: Battle Mountain Federal Well #14-15U

LEGAL DESCRIPTION: 6th PM, T. 12 N., R. 89 W., sec. 14, SWSE, Moffat County

APPLICANT: Entek GRB LLC

A. Describe the Proposed Action

The proposed action would be to approve one Application for Permit to Drill (APD) submitted by Entek GRB LLC. Entek proposes to drill one coal bed natural gas well on privately owned land into federal minerals located in 6th PM, T. 12 N., R. 89 W., sec. 14, SWSE, Moffat County. An APD has been filed with the LSFO for Battle Mountain Well # 14-15U. The APD includes drilling and surface use plans that cover mitigation of impacts to vegetation, soil, surface water, and other resources. Mitigation not incorporated by Entek in the drilling and surface use plans would be attached by the BLM as Conditions of Approval to an approved APD.

The proposed well would be located approximately 18 miles east of Baggs, Wyoming on an existing gas well location. Construction work was already done for the BM Federal Well #14-15 and no additional surface disturbance is anticipated for the Battle Mountain Well #14-15U. The estimated duration of drilling for the well would be 30-60 days to begin the fall of 2010. All proposed activity would be on lease and would not require a federal Right-of-Way.

The existing well pad was be cleared of all vegetation and leveled for drilling. Topsoil and native vegetation were stockpiled for use in reclamation. Approximately 2.0 acres was disturbed for construction of the well pad. This includes the 311' by 212' well pad, the topsoil, and subsoil piles. A closed loop system would be utilized and no reserve pit would be authorized. A cuttings pit would be constructed on the well pad to hold drill mud and cuttings and the pit would be backfilled when dry. If a well is a producer, cut portions of the well site would be backfilled and unused portions of the well site would be stabilized and re-vegetated. If a gas well proves unproductive, it would be properly plugged and the entire well pad and access road would be reclaimed.

Entek plans on tying into an existing water and gas line on lease and would not require a pipeline Right-of-Way.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Resource Management Plan and Record of Decision (ROD)

Date Approved: April 26, 1989

- Draft RMP/EIS February 1986
- Final RMP/EIS September 1986
- Colorado Oil and Gas Leasing and Development Final EIS January 1991

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

Colorado Public Land Health Standards, Decision Record & Finding of No Significant Impact and Environmental Assessment, March 1997.

- CO-100-2007-074 EA

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document? Yes. The current proposed action would be within the disturbance of BM Well #14-15 previously analyzed and approved in CO-100-2007-074EA.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values? Yes. CO-100-2007-074EA analyzed the area of the proposed action and the range of alternatives would be appropriate given the limited scope of this proposal. The area where the proposed action is located is within a developed oil & gas field and on an existing well pad. No additional surface disturbance would occur.

3. Is the existing analysis valid in light of any new information or circumstances? Yes. The proposed action would have no disproportionate impacts on minority populations or low income communities (E.O.12898) and the President's Executive Order, signed 01/10/01, which mandates evaluation of effects of actions and agency plans on migratory birds.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes. CO-100-2007-074EA methodology and analytical approach are appropriate to this proposed action.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing

NEPA document analyze site-specific impacts related to the current proposed action? Yes. CO-100-2007-074EA analyzed the direct, indirect, and site-specific impacts of the area covered under this current proposed action.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Yes, the cumulative impacts that would result from drilling an additional well from the existing well pad are substantially unchanged from those analyzed in EA CO-100-2007-074. The potential exists for future oil and gas development throughout the Slater Dome Field. Currently several producing wells exist within a one-mile radius of the proposed action.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Yes, the Notice of Staking is posted in the Little Snake Field Office for a minimum of 30 days before the Application for Permit to Drill is approved and issued to the applicant.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented	Initials/Date
Shawn Wiser	Natural Resource Specialist	Air Quality, Floodplains, Prime/Unique Farmlands, Surface Water Quality	SW 08/30/10
Ethan Morton	Archaeologist	Cultural Resources, Native American Concerns	EM 9/1/2010
Barb Blackstun	Realty Specialist	Environmental Justice	BSB 09/01/10
Chris Rhyne	Range Specialist	Invasive Non-native Species	CR 9/8/10
Hunter Seim	Rangeland Management Spec.	Sensitive Plants, T&E Plant	JHS 9/7/10
Gail Martinez	Wildlife Biologist	T&E Animal	GEM 09/09/10
Marty O'Mara	Petroleum Geologist	Ground Water Quality	EMO 9/8/10
Emily Spencer	Ecologist	Wetlands/Riparian Zones	ELS 8/30/10
Gina Robison	Outdoor Recreation Specialist	WSA, W&S Rivers	GMR 8/30/10

STANDARDS:

Name	Title	Standard	Initials/Date
Gail Martinez	Wildlife Biologist	Animal Communities	GEM 09/09/10
Gail Martinez	Wildlife Biologist	Special Status, T&E Animal	GEM 09/09/10
Hunter Seim	Rangeland Management Spec	Plant Communities	JHS 09/07/10
Hunter Seim	Rangeland Management Spec	Special Status, T&E Plant	JHS 09/07/10
Emily Spencer	Ecologist	Riparian Systems	ELS 08/30/10
Shawn Wiser	Natural Resource Specialist	Water Quality	SW 08/30/10

Shawn Wiser	Natural Resource Specialist	Upland Soils	SW 08/30/10
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Remarks:

CULTURAL RESOURCES

Affected Environment: Cultural resources, in this region of Colorado, range from late Paleo-Indian to Historic. For a general understanding of the cultural resources in this area of Colorado, see *An Overview of Prehistoric Cultural Resources, Little Snake Resource Area, Northwestern Colorado*, Bureau of Land Management Colorado, Cultural Resources Series, Number 20, *An Isolated Empire, A History of Northwestern Colorado*, Bureau of Land Management Colorado, Cultural Resource Series, Number 2 and *Colorado Prehistory: A Context for the Northern Colorado River Basin*, Colorado Council of Professional Archaeologists.

Environmental Consequences: The proposed project, Battle Mountain Federal Well #14-15U, has undergone a Class III cultural resource survey:

Mueller, Andrew, Christopher C. Kinneer, Cody M. Anderson, Mary W. Painter
2008 A Class III Cultural Resource Inventory of the New Frontier Energy Rattlesnake
POD in Moffat County, Colorado (BLM#66.1.08)

The survey identified no eligible sites to the National Register of Historic Places.

The following standard stipulations apply for this project:

1. The operator is responsible for informing all persons who are associated with the operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are encountered or uncovered during any project activities, the operator is to immediately stop activities in the immediate vicinity of the find and immediately contact the authorized officer (AO) at (970) 826-5000. Within five working days, the AO will inform the operator as to:

- Whether the materials appear eligible for the National Register of Historic Places;
- The mitigation measures the operator will likely have to undertake before the identified area can be used for project activities again; and
- Pursuant to 43 CFR 10.4(g) (Federal Register Notice, Monday, December 4, 1995, Vol. 60, No. 232) the holder of this authorization must notify the AO, by telephone at (970) 826-5000, and with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

2. If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation costs. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

Name of specialist and date: Ethan Morton 08/31/10

WILDLIFE, TERRESTRIAL

Mitigative Measures: CO-09: No surface disturbing activities between December 1 and April 30 in order to protect wintering mule deer and elk.

Name of specialist and date: Gail Martinez 09/09/10

T&E AND SENSITIVE ANIMALS

Mitigative Measures: CO-30: No surface disturbing activities between March 1 and June 30 in order to protect nesting greater sage-grouse and Columbian sharp-tailed grouse.

Name of specialist and date: Gail Martinez 09/09/10

MIGRATORY BIRDS

Mitigative Measures: All open vent stack equipment such as heater treaters, separators, dehydration units, and flare stacks would be designed and constructed to prevent birds and bats from entering or nesting in or on such units, and to the extent practical, to discourage birds from perching on the stacks.

Name of specialist and date: Gail Martinez 09/09/10

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist_____

Date_____

Signature of NEPA Coordinator_____

Date_____

Signature of the Authorizing Official_____ Date_____

Note: The signed Conclusion on this document is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.